

# **EXHIBIT G**

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13 Co-Lead Counsel for Plaintiffs

14 [Additional counsel appear on signature page.]

15 UNITED STATES DISTRICT COURT  
16  
17 NORTHERN DISTRICT OF CALIFORNIA  
18  
19 SAN JOSE DIVISION

20 HEAVY & GENERAL LABORERS' LOCALS) Master File No. 5:06-cv-03484-JF  
21 472 & 172 PENSION & ANNUITY FUNDS )  
22 and KENNETH DOSSETT, Derivatively on )  
23 Behalf of McAfee, INC., )

24 Plaintiffs,

25 vs.

26 GEORGE SAMENUK, STEPHEN C.  
27 RICHARDS, KEVIN M. WEISS, KENT H.  
28 ROBERTS, ERIC F. BROWN, LESLIE G.  
DENEND, ROBERT M. DUTKOWSKY,  
DENIS J. O'LEARY, ROBERT W. PANGIA,  
ROBERT B. BUCKNAM, LIANE S. WILSON,  
DALE L. FULLER, VERNON EUGENE  
HODGES, VIRGINIA GEMMELL, EDWIN  
HARPER, SYLVIA GARCIA-LECHELT,  
EVAN S. COLLINS, WILLIAM L. LARSON,  
DENNIS L. CLINE, ZACHARY A. NELSON,  
PRABHAT K. GOYAL, PETER R. WATKINS  
and ARTHUR MATIN,

Defendants,

- and -

McAfee, INC., a Delaware corporation,  
Nominal Defendant.

In re McAfee, INC. DERIVATIVE  
LITIGATION

[CORRECTED] CONSOLIDATED  
VERIFIED SHAREHOLDER DERIVATIVE  
COMPLAINT FOR VIOLATION OF THE  
FEDERAL SECURITIES LAWS AND  
STATE LAW CLAIMS FOR BREACH OF  
FIDUCIARY DUTY, ABUSE OF  
CONTROL, CONSTRUCTIVE FRAUD,  
CORPORATE WASTE, UNJUST  
ENRICHMENT, GROSS  
MISMANAGEMENT, BREACH OF  
CONTRACT, ACTION FOR AN  
ACCOUNTING AND VIOLATION OF  
CALIFORNIA CORPORATIONS CODE

DEMAND FOR JURY TRIAL

- 1 (vi) Reform executive compensation.
- 2 D. Ordering the imposition of a constructive trust over defendants' stock options and any
- 3 proceeds derived therefrom;
- 4 E. Awarding punitive damages;
- 5 F. Awarding costs and disbursements of this action, including reasonable attorneys',
- 6 accountants', and experts' fees; and
- 7 G. Granting such other and further relief as this Court may deem just and proper.

8 **JURY DEMAND**

9 Plaintiffs demand a trial by jury.

10 DATED: September 28, 2006

LERACH COUGHLIN STOIA GELLER  
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14 /s/  
15 SHAWN A. WILLIAMS

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